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7 Attorney for Jose Daniel Moreno-Pina

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 JOSE DANIEL MORENO-PINA,
14 Defendant.
15

Case No. 2:18-cr-00014-RFB-NJK

**STIPULATION TO CONTINUE
STATUS CONFERENCE HEARING
(First Request)**

16 IT IS HEREBY STIPULATED AND AGREED, by and between
17 Nicholas A. Trutanich, United States Attorney, and Susan Cushman, Assistant United
18 States Attorney, counsel for the United States of America, and Rene L. Valladares,
19 Federal Public Defender, and Nisha Brooks-Whittington, Assistant Federal Public
20 Defender, counsel for Jose Daniel Moreno-Pina, that the Status Conference Hearing currently
21 scheduled on March 4, 2020 at 1:30 p.m., be vacated and continued March 12, 2020 at
22 10:45 a.m.

23 The Stipulation is entered into for the following reasons:

24 1. On February 14, 2020, this Court issued a summons for Mr. Moreno-Pina to
25 appear for a status conference hearing on March 4, 2020. ECF No. 127. Mr. Moreno-Pina is
26 also scheduled to appear eight (8) days later for a sentencing hearing on March 12, 2020.

1 Mr. Moreno-Pina resides out of state and will have to travel for his upcoming hearings. As a
2 result, the parties are requested the status check hearing be continued to the date and time of
3 the currently scheduled sentencing hearing.

4 2. The parties seek a stipulation to consolidate the hearings and to allow
5 Mr. Moreno-Pina to travel on one occasion to address both the petition and his sentencing.

6 3. The defendant is not incarcerated and does not object to the continuance.

7 4. The parties agree to the continuance.

8 This is the first stipulation to continue filed herein.

9 DATED this 18th day of February 2020.

10 RENE L. VALLADARES
11 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

12 */s/ Nisha Brooks-Whittington*
13 By _____
14 NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender

/s/ Susan Cushman
By _____
SUSAN CUSHMAN
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3
4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 JOSE DANIEL MORENO-PINA,

8 Defendant.

Case No. 2:18-cr-00014-RFB-NJK

ORDER

9
10 IT IS ORDERED that the Status Conference hearing currently scheduled for
11 Wednesday, March 4, 2020 at 1:30 p.m., be vacated and continued to March 12, 2020 at
12 10:45 a.m.

13 DATED this 25th day of February, 2020.

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16 RICHARD F. BOULWARE, II
17 UNITED STATES DISTRICT JUDGE
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